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**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

AMERICAN FEDERATION OF
GOVERNMENT EMPLOYEES, *et al.*

Plaintiffs,

v.

DONALD J. TRUMP, in his official capacity as
President of the United States, *et al.*,

Defendants.

Case No. 3:25-cv-03698-SI

**DEFENDANTS' MOTION TO SHORTEN
TIME FOR PLAINTIFFS TO RESPOND
TO MOTION TO QUASH AND FOR A
PROTECTIVE ORDER**

(LOCAL RULE 6-3)

1 Defendants respectfully move for an Order shortening Plaintiffs' time to respond to their
2 forthcoming motion for a protective order and/or to quash Plaintiffs' Request for Production of
3 Documents, ECF NO. 178-1 Ex. A (RFPs). As will be set forth in Defendants' motion, Defendants
4 oppose those RFPs on a number of grounds, including that they: (1) seek discovery that should be
5 deferred pending resolution of Defendants' forthcoming motion to dismiss; (2) improperly seek
6 discovery on Administrative Procedure Act claims; (3) seek discovery related to legal theories
7 foreclosed by the Supreme Court's recent order staying this Court's preliminary injunction; (4)
8 seek information that is privileged; and (5) otherwise seek discovery that is overly burdensome,
9 irrelevant, and that relates to potential relief that this Court could not grant. Absent such an order,
10 the motion cannot be noticed for a hearing until 35 days from today, which would be after
11 Defendants' deadline to respond to the discovery even if the Court denies Plaintiffs' pending
12 motion to shorten Defendants' time to respond to the discovery (which Defendants will also
13 oppose). Defendants have conferred with Plaintiffs, who have agreed to a July 21 deadline for their
14 response. Defendants thus respectfully request that the Court enter the following proposed
15 schedule:

16 Plaintiffs' opposition to the motion for a protective order and/or to quash shall be due
17 Monday July 21.

18 Defendants' reply in support of the motion for a protective order and/or to quash shall be
19 Wednesday July 23.

20 A proposed order reflecting this schedule is attached.
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1 Dated: July 15, 2025

Respectfully submitted,

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